

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION))	
BUREAU, et al.,)	
)	
Plaintiffs,)	CASE NO. 24-CV-40-EAW-MJR
)	
v.)	
)	
STRATFS, LLC (f/k/a STRATEGIC FINANCIAL)	
SOLUTIONS, LLC), et al.)	
)	
Defendants, and)	
)	
DANIEL BLUMKIN, et al.)	
)	
Relief Defendants.)	
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NOTICE OF EMERGENCY MOTION TO MODIFY THE ASSET FREEZE

MOTION BY:	Defendant Ryan Sasson and Relief Defendants Daniel Blumkin and Albert Ian Behar.
RELIEF SOUGHT	A modification of the preliminary injunction, entered March 4, 2024 (ECF 184), prohibiting Plaintiffs from freezing assets of unrelated businesses.
WHEN RETURNABLE	As directed by the Court
WHERE RETURNABLE	Hon. Magistrate Judge Michael J. Roemer United States Courthouse 2 Niagara Square Buffalo, New York 14202
IN SUPPORT	Memorandum of Law in Support of Motion, dated March 12, 2024

Respectfully submitted,

Dated: March 12, 2024

/s/ Ronald S. Safer

Ronald S. Safer (*pro hac vice*)

Rodney Perry (*pro hac vice*)

Matthew Kennison (*pro hac vice*)

Maegan McAdam

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Relief Defendants Daniel Blumkin, Albert Ian
Behar, Blaise Investments LLC, Twist
Financial LLC, and Duke Enterprises LLC*

CERTIFICATE OF SERVICE

I, Ronald S. Safer, an attorney, hereby certify that on March 12, 2024, I caused a copy of the foregoing to be served via CM/ECF upon all counsel of record.

/s/ Ronald S. Safer